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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D. C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Forward-Looking Mechanism For High Cost Support	)	CC Docket No. 97-160
	)	

COMMENTS

BellSouth Corporation on behalf of itself and its affiliated companies ("BellSouth") hereby submits its comments on the Petitions filed by the Nebraska Public Service Commission, Tennessee Regulatory Authority, Public Service Commission of Nevada, Maine Public Utilities Commission and NARUC (collectively "Petitioners") requesting an extension of time in which to submit forward-looking cost studies for the determination of federal universal service support.

In its *Universal Service Order*, the Commission directs state commissions that elect to conduct their own forward-looking economic cost studies for determining federal universal service support for non-rural local exchange carriers to submit such studies to the Commission on or before February 6, 1998.<sup>1</sup> Thereafter, the Commission intends to seek comment on the studies and determine whether the studies meet the criteria set forth in *Universal Service Order*.<sup>2</sup>

As the Petitioners indicate, the state commissions are diligently working on fulfilling their obligations under the Universal Service Order. Hearings are being conducted to provide the respective state commissions the information necessary to reach a reasoned decision. The

<sup>1</sup> *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, released May 8, 1997 at ¶ 248. ("*Universal Service Order*")

<sup>2</sup> *Id.*

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Petitioners explain that determining an appropriate cost model is a complex undertaking that simply cannot be completed by the February 6 date that the *Universal Service Order* establishes. Accordingly, the Petitioners request an extension of time in order to provide state commissions with sufficient time to complete their proceedings.

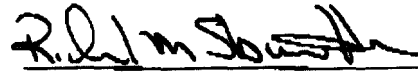
Granting state commissions additional time in which to determine an appropriate forward-looking cost study would be in the public interest and consistent with the Commission's objectives in the universal service proceeding. The Federal-State Joint Board and the Commission recognize the importance of state involvement in the development of the new universal service fund. A key element is the invitation for state commissions to determine the appropriate forward-looking cost methodology to be used in calculating federal universal service support. Having solicited state commission involvement, it is in the public's and Commission's interests that the Commission assure that the state commissions have an adequate time to complete their work. The limited extensions of time that have been requested would allow the state commissions to finish their hearings and reach a decision without jeopardizing the planned January 1, 1999 implementation date of the new federal universal service fund.

Accordingly, the Commission should grant a limited extension of time as the Petitioners request.

Respectfully submitted,

BELLSOUTH CORPORATION

By:



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Date: November 19, 1997

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 19th day of November, 1997 served all parties to this action with a copy of the foregoing **COMMENTS** by placing a true and correct copy of the same in the United States Mail, postage prepaid, addressed to the parties listed below.

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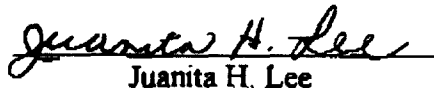
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